IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF FLORIDA GAINESVILLE DIVISION

UNITED STATES OF AMERICA

v.	INDICTMENT

ARTHUR LARANGE LEE JR.

1:17CR3 MW/GPJ

THE GRAND JURY CHARGES:

COUNT ONE

Between on or about August 4, 2016, and on or about August 5, 2016, in the Northern District of Florida, the defendant,

ARTHUR LARANGE LEE JR.,

in and affecting interstate commerce, did knowingly harbor, transport, provide, obtain, advertise, and maintain a person, that is, C.A.W., knowing that force, threats of force, fraud, coercion, and any combination thereof, would be used to cause that person to engage in a commercial sex act.

In violation of Title 18, United States Code, Sections 1591(a)(1) and 1591(b)(1).

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COUNT TWO

Between on or about August 4, 2016, and on or about August 5, 2016, in the Northern District of Florida and elsewhere, the defendant,

ARTHUR LARANGE LEE JR.,

did knowingly use a facility in interstate commerce, that is, the internet, with intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on, of an unlawful activity, specifically, a prostitution offense in violation of the laws of the state of Florida and the United States, and did thereafter perform and attempt to perform an act to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on, of such unlawful activity.

In violation of Title 18, United States Code, Section 1952(a)(3).

COUNT THREE

Between on or about August 4, 2016, and on or about August 5, 2016, in the Northern District of Florida and elsewhere, the defendant,

ARTHUR LARANGE LEE JR.,

did knowingly use a facility in interstate commerce, that is, a cellular telephone, with intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on, of an unlawful activity, specifically, a prostitution offense in violation of the laws of the state of Florida and the United

States, and did thereafter perform and attempt to perform an act to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on, of such unlawful activity.

In violation of Title 18, United States Code, Section 1952(a)(3).

CRIMINAL FORFEITURE

The allegations contained in Counts One, Two, and Three of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture. Because the defendant,

ARTHUR LARANGE LEE JR.,

- A. As to Count One of this Indictment, did knowingly commit an offense in violation of Section 1591 of Chapter 77, any and all interest that this defendant has in any property, real and personal, used and intended to be used to commit and facilitate the commission of said offense, or constituting or derived from any proceeds obtained directly or indirectly as a result of such violation, is vested in the United States and hereby forfeited to the United States, pursuant to Title 18, United States Code, Sections 1594(d) and 1594(e).
- B. Engaged in the violations alleged in Counts Two and Three of this Indictment, the defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any and all of the defendant's right, title, and interest in any

property, real and personal, constituting, and derived from, proceeds traceable to such offenses.

If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendant:

- i. cannot be located upon the exercise of due diligence;
- ii. has been transferred or sold to, or deposited with, a third party;
- iii. has been placed beyond the jurisdiction of this Court;
- iv. has been substantially diminished in value; or
- v. has been commingled with other property that cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 1594 (e)(2), and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property.

A TRUE BILL:

CHRISTOPHER P. CANOVA

United States Attorney

F.T. WILLIAMS

Assistant United States Attorney